

HDM:DGR/DAS  
F. #2022R00860

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

AURELIEN MICHEL,

Defendant.

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I N F O R M A T I O N

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§ 371, 981(a)(1)(C) and  
3551 et seq.; T. 21, U.S.C., § 853(p);  
T. 28, U.S.C., § 2461(c))

THE UNITED STATES ATTORNEY CHARGES:

CONSPIRACY TO COMMIT WIRE FRAUD

1. In or about and between September 2021 and December 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant AURELIEN MICHEL, together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud one or more individual nonfungible token holders and to obtain money and property from them by means of one or more materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce writings, signs, signals, pictures and sounds, contrary to Title 18, United States Code, Section 1343.

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant AURELIEN MICHEL, together with others, did commit and cause the commission of, among others, the following:

OVERT ACT

(a) On or about May 6, 2022, on a public website created in connection with the fraudulent scheme, MICHEL and his co-conspirators falsely represented to nonfungible token investors, including investors and potential investors located in the Eastern District of New York, that he and his co-conspirators intended to deliver certain benefits to these investors, including, but not limited to, a merchandise collection and a “community wallet” for marketing and raffles.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;

- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

*By Carolyn Pokorny, Assistant U.S. Attorney*

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BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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**THE UNITED STATES OF AMERICA**

vs.

AURELIEN MICHEL,

Defendant.

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**INFORMATION**

(T. 18, U.S.C., §§ 371, 981(a)(1)(C) and 3551 et seq.;  
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

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*A true bill.*

\_\_\_\_\_  
*Foreperson*

Filed in open court this \_\_\_\_\_ day,  
of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

Bail, \$ \_\_\_\_\_

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***Drew G. Rolle and Dylan A. Stern,***  
***Assistant U.S. Attorneys (718) 254-6783/6213***